



August 6, 2019

Diana Welling  
Department Head  
Resource Protection and Review  
State Historic Preservation Office  
800 E. 17<sup>th</sup> Ave.  
Columbus, Ohio 43211

Dear Ms. Welling:

In accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, we are providing information for your review and concurrence regarding the Gorge Dam Removal project (project number 709137CH.PP.01). The U.S. Environmental Protection Agency (USEPA), the lead federal agency, is coordinating this project in cooperation with the Ohio Environmental Protection Agency (Ohio EPA), Summit Metro Parks (SMP), FirstEnergy, the County of Summit, Summit County Council, the State of Ohio, the City of Akron, and the City of Cuyahoga Falls. Collectively, these are the Gorge Stakeholders. The cultural resources staff of SMP is developing the Section 106 coordination for this project on behalf of the USEPA.

**Project Information and Area of Potential Effects:**

The project in question is the proposed removal of the Gorge Dam, located in Gorge Metro Park in Cuyahoga Falls, Summit County, Ohio. The objective of the project is to reestablish natural conditions and habitat along the middle and lower segments of the Cuyahoga River and remove Beneficial Use Impairments (BUIs) in the Cuyahoga River Area of Concern (AOC). This will be achieved through the removal and remediation of contaminated sediments within the dam pool and the removal of the dam structure.

The dam removal project is occurring in multiple phases. Phase I was a study of the feasibility of the dam removal. Phase II, underway at the time of the writing of this letter, includes sediment management studies, design of the sediment management strategy, a

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hydraulic study, a geologic study and a review of cultural resources. Phase III will consist of sediment removal and management, and in Phase IV the dam will be removed and river restoration will begin. The project is expected to be completed in 2023. The sediment removal (Phase III) and dam demolition (Phase IV) are currently being designed. Because of the phased nature of this project there are no finalized plans with delineated limits of construction at the time of the writing of this letter.

A general outline of the project's area of potential effects (APE) can be seen in Figure 1 of this letter. The APE includes the area immediately surrounding the dam, which is located on the Cuyahoga River roughly in the center of Gorge Metro Park. The dam pool is also within the APE, as removal of the 57-foot dam will cause the water level to recede considerably. Heading west from the dam is a linear tract proposed as the route of the sediment removal. The proposed route is approximately 2.25 km along Highbridge Trail, which connects Gorge and Cascade Valley Metro Parks, joining with Peck Road. Sediment will be pumped from where it has accumulated in the dam pool and piped via a large hose to a sediment placement area. The proposed sediment placement area is a 35-acre area adjacent and east of the Cuyahoga River (outside the 100 year floodplain) in the Chuckery Area of Cascade Valley Metro Park.

According to the Final Phase 1 and 2 Summary Report for Determination of the Nature and Extent of Potential Contaminant Concentrations in Sediments Within the Cuyahoga River Project Area prepared by Battelle for U.S. EPA GLNPO (2012), there are 832,000 cubic yards of non-toxic but moderately contaminated sediments behind the dam which must be removed. The contamination level depicts a condition that requires dredging and open land filling. Sediment will be placed in large geotubes which will allow the sediment to be dewatered; the geotube will be left in place and capped with soils. It is expected that the sediment will raise this area by about 4 to 5 meters. The placement of the sediment and the dewatering process will not impact water quality or human health and the final use of this area will be for active and passive recreation.

## **Cultural Resource Assessments**

Cultural resources and potential impacts to them were assessed throughout Gorge Metro Park and in the Chuckery Area of Cascade Valley Metro Park (Figure 2). Potential



impacts may come from the removal and placement of the sediment, the lowering of water in the dam pool, and the demolition of the dam itself. In addition to physical impacts associated with the project, viewshed impacts from the removal of the dam structure, the lowering of the water level in the dam pool, and the placement of sediment in Cascade Valley Metro Park were also considered. The cultural resource assessments can be found in the attached documents:

- *Gorge Dam Removal Architecture/History Survey* (Zimmerman 2019)
- *Report on the Historic Research and Archaeological Investigation of Gorge Metro Park, Cities of Cuyahoga Falls and Akron, Summit County, Ohio* (Whitman et al 2010) and its updated addendum (Gintert and Shaeffer 2019)
- *Archaeological Assessment of the Sediment Removal and Sediment Placement Project Areas in Cascade Valley Metro Park for the Gorge Dam Removal Project* (Shaeffer et al 2019).

#### *History/Architecture Assessment and Evaluation*

History/architecture sites and features were identified and evaluated using National Register of Historic Places (NRHP) criteria to determine if they should be considered historic properties and if potential impacts to them could be adverse effects. Eleven sites were documented on the Ohio Historic Inventory (OHI). Of these, four were determined to be eligible for inclusion on the NRHP: the Gorge Shelter (SUM0381008), two sets of Works Progress Administration (WPA) stairs (SUM0381312), a rock shelter known as Old Maid's Kitchen (SUM0381108), and a natural feature known as Hunter's Pass/Labyrinth (SUM0381208). One more site within the project area is already listed on the NRHP: the Chuckery Race (NR# 72001047). The sites and features evaluated in Zimmerman (2019) can be found in Table 1 in said report.

The Gorge Shelter (SUM0381008) within Gorge Metro Park and the two sets of stairs built by the WPA in Cascade Valley Metro Park (SUM0381312) are features that were built as part of Depression-era civil works programs in 1937. The Gorge Shelter was constructed in 1937 by the Civilian Conservation Corps, who built a number of structures and features throughout Summit Metro Parks during the early years of the park system's development (at the time it was the Akron Metropolitan Park District). The stairs, located in what was High



Bridge Park and is now Cascade Valley Metro Park were constructed by the WPA as part of a set of improvement projects across Akron's city parks in the 1930s. Both are eligible for inclusion on the NRHP as part of a Multiple Property Documentation (MPD) of structures and features constructed as part of the Depression-era civil works programs. This determination is based on the integrity of the features themselves as well as on a letter from the State Historic Preservation Office (SHPO) dated January 18, 2018 (see attached). This letter was written in response to a National Register Questionnaire (NRQ) submitted in 2018 regarding the eligibility of the Gorge Shelter and other CCC structures or features within the parks. Although the WPA stairs were not constructed by the CCC, they are part of the New Deal work relief programs that created much of the early infrastructure throughout many area parks and should be preserved as a cohesive body of work.

Old Maid's Kitchen and Hunter's Pass/Labyrinth are both natural features in Gorge Metro Park related to the early recreational use of the area. Old Maid's Kitchen has been an important recreational destination since the mid-1800s and is often depicted on postcards or in photographs of the area from the 1800s through the present day. It is the subject of a persistent local myth related to a woman named Mary Campbell who was kidnapped by the Lenape and supposedly lived in the rock shelter at some point, but there is no evidence that this specific incident is based in fact. Zimmerman (2019) recommends the shelter as eligible under Criterion A based on its enduring cultural significance in the history of the Gorge.

Hunter's Pass/Labyrinth is a natural feature on the western side of Gorge Metro Park, north of the Cuyahoga River. It consists of a section of approximately 700 linear feet of trail as well as intentionally shaped and placed stone steps, creating access points through narrow rock passageways. Zimmerman (2019) recommends that this site is eligible for the NRHP under Criterion A based on its significance in the recreational history of the park and its remarkable integrity (based on comparison with photographs from the late 1800s).

The Chuckery Race was constructed along the southern edge of the Cuyahoga River and extends from the eastern end of Gorge Metro Park. West of Front Street, a railroad spur and later Highbridge Trail was constructed on top of the Race. Despite this, portions of the Race are still extant in the steep banks of Highbridge Trail. The Race continues into Cascade Valley Metro Park and turns south just under the High Level Bridge to follow along the eastern



edge of the Chuckery area of that park. It was completed in 1844 and although it was a contemporary commercial and financial failure, large portions of it remain extant and in good condition today (particularly on its eastern end). It was placed on the NRHP in 1972.

### *Archaeological Evaluation*

Five archaeological sites were documented in Whitman et al (2010), one in Gintert and Shaeffer (2019) and two in Shaeffer et al (2019). All sites were evaluated using NRHP criteria to determine their status as historic properties. Of these eight archaeological sites, two can be considered historic properties: the Chuckery Race (see above) and a set of CCC Latrines (33 Su 702) located on the western side of Gorge Metro Park, north of the Cuyahoga River. These latrines can be included as part of the MPD discussed above, as they are part of the Depression-era civil works programs along with the Gorge Shelter and the WPA stairs. The latrines appear to have been part of a plan to convert a portion of the western area of Gorge Metro Park to a picnic area using CCC labor, as they show up on park planning maps dating to the 1930s along with other CCC improvements but are absent on subsequent maps (Gintert and Shaeffer 2019).

### **Potential Adverse Effects**

As noted above, there are six historic properties within the APE for the Gorge Dam removal project. Based on what is known at this time regarding project area, the sediment removal and placement process, the lowering of the dam pool, and the demolition of the dam, there could be adverse effects (as defined in 36 CFR 800.5) to the Chuckery Race and the WPA stairs. Placement and maintenance of (and any unexpected failures related to) the sediment removal hose/pipe could potentially have an adverse effect on the Chuckery Race if it is placed along this feature. As of the writing of this letter, the preferred route is located along Highbridge Trail; extant portions of the Chuckery Race are still visible in places along this trail. The WPA stairs could likewise be affected by the sediment removal process as it winds through the Chuckery Area of Cascade Valley Metro Park.

Two important points must be made about the potential for sites to be uncovered during the Gorge Dam Removal project. The first is that sites, features, or artifacts may be



revealed with the lowering of the dam pool. The second is that because plans are not finalized, changes in preferred routes or work areas could result in adverse effects to more historic properties than the two noted above or to previously unidentified cultural resources.

## **Coordination Process**

Because of the phased nature of this project and because there are no finalized plans as of the writing of this letter, the most reasonable course of action is the development of a project-specific programmatic agreement (PSPA) between the SHPO, USEPA, OEPA, SMP, and the other Gorge Stakeholders. Such an agreement would outline what might be considered adverse effects on historic properties. Recommendations for avoidance, minimization, or mitigation of adverse effects would be given in the PSPA as well. Procedures for discoveries, particularly those related to the lowering of the dam pool, would be discussed and agreed upon in a PSPA, as would mechanisms for any necessary further cultural resources review. For example, although there are no previously identified prehistoric archaeological sites within the APE and the work appears to be limited to riverbed or previously disturbed areas, there are prehistoric archaeological sites throughout the Cuyahoga River Valley. If plans for this project were to change to involve earthmoving in previously undisturbed areas, further archaeological work might be necessary. Such requirements would be incorporated into the PSPA.

## **Conservation Plan**

As part of the cultural resource coordination for the Gorge Dam Removal project, SMP has developed a plan for identifying, evaluating, documenting, and, where appropriate, conserving artifacts, features, or sites revealed by the lowering of the dam pool. This plan is attached here (Gintert 2019) and involves monitoring during the lowering process by use of drone imagery. It is expected that natural features which were part of the early recreational fabric of the park will also be revealed once the water level recedes.

## **Conclusion**

In compliance with Section 106 of the National Historic Preservation Act and its regulations as codified in 36 CFR 800, a review of historic properties was conducted to assess



any potential impacts removal of the Gorge Dam may have on cultural resources. The cultural resource assessments outlined above show that this project could cause adverse effects to historic properties as defined in 36 CFR 800.5. Because the plans for this project are not yet finalized and because it is occurring in multiple phases, it is the recommendation of the cultural resources staff of SMP that a PSPA be developed so that cultural resources may be taken into consideration in the design and implementation of all aspects of the Gorge Dam Removal project. The PSPA will allow adverse effects to be avoided or minimized where possible or mitigated where this is not possible.

Sincerely,

Megan Shaeffer  
Cultural Resources Coordinator  
Summit Metro Parks

**References:**

Gintert, Charlotte

2019 *Master Plan for Cultural Resources Monitoring and Conservation for Gorge Metro Park After Dam Removal*. Unpublished report on file at Summit Metro Parks.

Gintert, Charlotte and Megan Shaeffer

2019 *Addendum to Report on the Historic Research and Archaeological Investigation of Gorge Metro Park, Cities of Cuyahoga Falls and Akron, Summit County, Ohio*. Unpublished report on file at Summit Metro Parks.

Shaeffer, Megan, Charlotte Gintert, and Peg Bobel

2019 *Archaeological Assessment of the Sediment Removal and Sediment Placement Project Areas in Cascade Valley Metro Park for the Gorge Dam Removal Project*. Unpublished report on file at Summit Metro Parks.

USEPA

2012 *Task 2: Final Phase 1 and 2 Summary Report for Determination of the Nature and Extent of Potential Contaminant Concentration in Sediments within the Cuyahoga River Project Area*. Prepared for USEPA GLNPO, Chicago, IL. Prepared by Battelle, Columbus, OH.



Whitman, Linda G., Lynn Metzger, and Peg Bobel

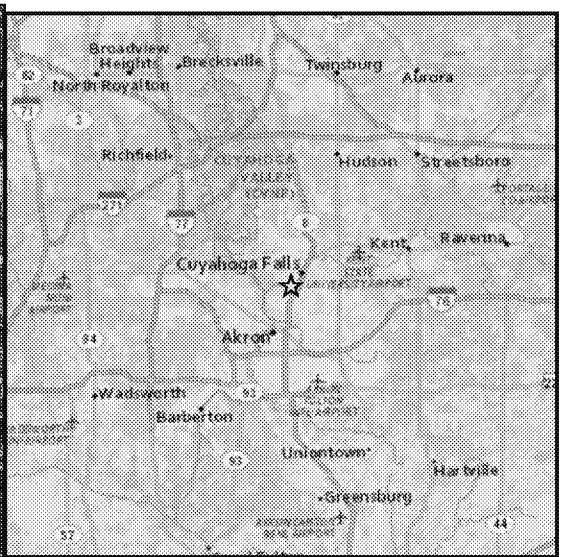
2010 *Report on the Historic Research and Archaeological Investigation of Gorge Metro Park, Cities of Cuyahoga Falls and Akron, Summit County, Ohio.* Unpublished report on file at the Ohio Historic Preservation Office.

Zimmerman, Courtney

2019 *Gorge Dam Removal Architecture/History Survey.* Unpublished report on file at Summit Metro Parks.



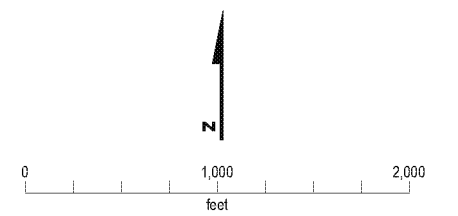




#### LEGEND

- ★ Gorge Dam
- ▨ Proposed Equipment Staging/Laydown Area
- ▤ Proposed Cascade Valley South MetroPark Disposal Site (Chuckery Area)
- - - Estimated Sediment Removal Limits
- - - Proposed Dredge Material Transport Pipeline
- ▭ MetroParks Boundary
- ==== Highbridge Trail

Imagery Source:  
Summit County 2017



**Figure 1**  
**Project Area**  
Cuyahoga River Gorge Dam GLLA Project  
Cuyahoga Falls, Ohio



January 18, 2018

Megan Shaeffer, Ph.D.  
Cultural Resource Specialist  
Summit Metro Parks  
975 Treaty Line Road  
Akron, Ohio 44313

Dear Dr. Shaeffer,

RE: CCC Related Properties within the Summit Metro Parks System, Summit County

Thank you for submitting additional information to provide a comprehensive understanding of the extent of Civilian Conservation Corps (CCC) associated properties located in the Summit Metro Parks system within Summit County. A committee of staff from the Inventory & Registration Department and other program areas of the State Historic Preservation Office have carefully reviewed the questionnaire, photographs and additional documentation.

As you know, properties considered for National Register listing are evaluated within an appropriate context. Each of the CCC related properties in the park system bears a direct association with all of the other properties constructed in relation to the New Deal programs executed within the park system. Together, through this context, they tell an important story. The most likely path to successfully listing this group of significant historic properties will be through the completion of a National Register of Historic Places Multiple Property Documentation (MPD).

This form will establish the significance of the Summit Metro Park System's CCC related properties within the broad context of the New Deal programs and within the development of the county's park system during an appropriately determined time period. The MPD is a cover document and long range planning tool that identifies and develops themes, trends and patterns of history shared by associated groups of properties.

The MPD also serves as a basis for evaluating the National Register eligibility of related individual properties. It may be used to nominate and register thematically related historic properties simultaneously with its completion or to establish the registration requirements for properties that maybe be nominated in the future. In other words, the MPD documentation form and one or more accompanying nomination form(s) can be written and submitted at the same time or the MPD can be completed first and individual

nomination forms for individual properties submitted at a later time. Often the MPD is completed along with a nomination for one representative property and then subsequent properties are nominated and listed in association with the MPD at a later date.

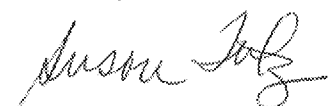
The National Register of Historic Places program through the National Park Service provides detailed instructions for completing the MPD document in both the *National Register Bulletin 16A: How to Complete the National Register Registration Form* and in the *National Register Bulletin 16B: how to Complete the National Register Multiple Property Documentation Form*. Unfortunately, staff workload does not permit our office to complete nominations, so you may either research and prepare the nomination yourself or hire a historic preservation professional to do it for you. A list of historic preservation consultants can be found at our web site:

<https://www.ohiohistory.org/preserve/state-historic-preservation-office/hpforms/consultants>.

If you prefer to complete the nomination yourself, please access the necessary guidance and requirements for completing the National Register nomination form and accompanying documentation online at: [www.ohiohistory.org/nrpacket](http://www.ohiohistory.org/nrpacket).

Thank you for your interest in the National Register of Historic Places program. If you have any questions about this letter or the National Register process, please feel free to call me at 614-298-2000 or email me at [stietz@ohiohistory.org](mailto:stietz@ohiohistory.org).

Sincerely,



Susan Tietz  
Survey and National Register Manager  
State Historic Preservation Office  
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